

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	WT Docket No 02-146
Allocations and Service Rules for the 71 – 76 GHz,)	
81 – 86 GHz and 92 – 95 GHz Bands)	
)	
Loe Communications Corporation Petition for)	RM-10288
Rulemaking)	

Reply Comments of the Information Technology Industry Council

The Information Technology Industry Council (ITI) represents the top U.S. providers of information technology products and services. ITI is the voice of the high tech community, advocating policies that advance industry leadership in technology and innovation, open access to new and emerging markets, support e-commerce expansion, protect consumer choice, and enhance the global competitiveness of its member companies.

ITI welcomes this opportunity to provide comments in response to the Notice of Proposed Rulemaking regarding allocation of services in the 71-76, 81-86 GHz bands.

ITI applauds the Commission's efforts to open up new bands for wireless services and strongly encourages the Commission to continue such efforts. ITI suggests that the 71 – 76 and 81-86 GHz bands would be best utilized by a licensed service operating under Part 101 of the FCC's technical rules. It should be noted, however, that ITI is a very strong proponent of unlicensed services that allow users to inexpensively set up wireless networks.

This proposal envisions offering high speed point-to-point wireless operation. ITI suggests that for such an operation to be effective, these services should operate under a licensing regime to protect these systems from interference from other services. Therefore, ITI recommends that these bands remain restricted under Part 15.205.

ITI generally supports licensing these bands. However, ITI does not support either a geographic type license or any auctioning of these frequency bands because we believe neither of these options would be beneficial to the enterprise or small business

user. ITI recommends adoption of a streamlined Part 101 application that would be used to register multiple sites.

ITI understands registration and coordination of multiple sites from enterprise users could be overly burdensome to the Commission. Therefore, ITI recommends that these functions be allocated to qualified frequency coordinators, who through the use of a web-servers would streamline the process. The only action required by the Commission would be to periodically audit the activities of the frequency coordinators.

Finally, ITI does not support increasing the coordination zone around Radio Astronomy Service (RAS) from 25 to 100 kilometers. ITI believes that these short range, narrow beam, point-to-point systems will not increase the risk of interference to RAS and therefore, cannot support a claim that a bigger coordination zone is needed.

ITI supports making the 71-76 and 81-86 GHz bands available for licensed use-only with a streamline licensing process. We believe this action will result in a substantial benefit to consumers of these products. ITI encourages the Commission to act promptly on this matter.

Respectfully submitted,

Rhett Dawson
President